

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANY AND ALL ASSETS OF
THE BATALLA SETTLEMENT, HELD BY
THE GENERAL TRUST COMPANY S.A.,
AS TRUSTEE, PRINCIPALITY OF MONACO,
FURTHER DESCRIBED ON SCHEDULE A
ATTACHED HERETO,

ANY AND ALL ASSETS OF
THE CHILDREN'S ASSISTANCE TRUST, HELD BY
THE GENERAL TRUST COMPANY S.A.,
AS TRUSTEE, PRINCIPALITY OF MONACO,
FURTHER DESCRIBED ON SCHEDULE A
ATTACHED HERETO,

and


ANY AND ALL FUNDS IN
ACCOUNT NO. 20357480001
IN THE NAME OF
"QUADRANGLE NOMINEES LTD K207"
AT BARCLAY'S BANK PLC,
PRINCIPALITY OF MONACO,
FURTHER DESCRIBED ON SCHEDULE A
ATTACHED HERETO,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Plaintiff, the United States of America, files this civil Complaint for Forfeiture in Rem
against the above-captioned defendant properties and states:

1. This is a civil action for forfeiture in rem of the above-captioned defendant properties.

FILED BY 
OCT 28 PM 4:12
CLARENCE HADDON
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIA

03 - 22884

CIV - LENARD

MAGISTRATE JUDGE
SIMONTON



2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1345, 1355, 1395 and 2461.

3. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1355(b), because certain acts and omissions giving rise to the forfeiture, and upon which this cause of action is based, occurred within the Southern District of Florida.

4. The defendant properties are more particularly described as:

a) ANY AND ALL ASSETS OF THE BATALLA SETTLEMENT, HELD BY THE GENERAL TRUST COMPANY S.A., AS TRUSTEE, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO,

b) ANY AND ALL ASSETS OF THE CHILDREN'S ASSISTANCE TRUST, HELD BY THE GENERAL TRUST COMPANY S.A., AS TRUSTEE, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO, and

c) ANY AND ALL FUNDS IN ACCOUNT NO. 20357480001 IN THE NAME OF "QUADRANGLE NOMINEES LTD K207" AT BARCLAY'S BANK PLC, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO.

5. The defendant properties have been or will be restrained pursuant to lawful authority of the government of the Principality of Monaco, pending commencement of these proceedings and the issuance of process from this Court.

6. Upon service of a Warrant of Arrest In Rem entered by the Court, the Court will have constructive control over the defendant properties pursuant to 28 U.S.C. § 1355(b)(2). Jurisdiction of the Court over the defendant properties is conferred by its constructive control of the properties

pursuant thereto. See also United States v. All Funds on Deposit in the Name of Meza, et al., 856 F. Supp. 759 (E.D.N.Y. 1994), aff'd, 63 F.3d 148 (2d Cir. 1995), cert. denied, 517 U.S. 1155 (1996).

7. The defendant properties are traceable to exchanges of illegal controlled substances (“drug proceeds”). Those drug proceeds include, but are not limited to, any and all forms of bank accounts, securities, investments, stocks, bonds, trusts, loans, receivables, or currency in any form, and all accrued interest thereon, which were created with or emanate from funds placed in two original trust accounts established at Abacus Financial Services Limited (“Abacus”), St. Helier, Jersey (Channel Islands) (“Jersey”), or its predecessor(s), under the names of Queen Noelle Settlement and Harmony Trust.

8. The United States of America seeks the forfeiture of the defendant properties pursuant to 21 U.S.C. § 881(a)(6), arising from felony violations of 21 U.S.C. §§ 801 et seq., on the ground that the defendant properties are proceeds traceable to one or more exchanges for a controlled substance.

9. Pursuant to 21 U.S.C. § 881(a)(6), all monies, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance, and all proceeds traceable to such an exchange, shall be subject to forfeiture to the United States and no property right shall exist in them.

10. Marijuana is a controlled substance as defined in 21 U.S.C. §§ 802 and 812.

FACTUAL BACKGROUND OF THE INVESTIGATION

The Southern District of Florida Investigation

11. Paul Edward Hindelang Jr. (“Ed Hindelang”) illegally smuggled marijuana into the United States in the 1970s and until 1981.

12. In 1981, Ed Hindelang was indicted for and pled guilty to the importation of approximately 500,000 pounds of marijuana and conspiring to import an additional 150,000 pounds of marijuana into the Eastern District of Louisiana and elsewhere, including the Southern District of Florida, in United States v. Paul Edward Hindelang, Jr., et al., CR 81-109, section F (E.D. La. May 7, 1981). Additionally, he agreed to forfeit \$640,000 in United States currency in drug proceeds to the United States pursuant to 21 U.S.C. § 881(a)(6).

13. In or about December of 1997, Ed Hindelang met with law enforcement agents and admitted that at the time of his plea agreement in 1981, he had concealed approximately \$32 million in additional drug proceeds outside the United States.

14. Ed Hindelang further stated that in or about 1980, he turned over control of his drug proceeds, including accounts located at Union Bank of Switzerland (“UBS”) and elsewhere to Tomas Batalla Esquivel (“Batalla”), who was to act as Ed Hindelang’s nominee. In furtherance of his efforts to conceal and otherwise inhibit the United States from discovering these offshore drug proceeds, Ed Hindelang removed his name from the UBS account(s) and had Batalla assume control.

15. Batalla and others subsequently caused the transfer of Hindelang’s drug proceeds out of Switzerland and elsewhere and into Abacus or its predecessor(s).

16. In 1998, Ed Hindelang agreed to and did forfeit \$50 million to the United States pursuant to 21 U.S.C. § 881 and 18 U.S.C. § 981. The funds used to satisfy this agreement came from the Jersey and Guernsey accounts with the assistance of Batalla. Absent any challenge to the forfeiture, the Court accepted as true the allegations set forth in the Complaint concerning the origin and nature of the \$50 million as drug proceeds. *A Default Judgment for Forfeiture* was entered in

the case of United States of America v. Fifty Million Dollars in U.S. Currency, Plus Accrued Interest, Case No. 98-3090-Civ-Hoeveler (S.D. Fla. May 27, 1999).

The Jersey Investigation

17. In or about August 1999, the investigation revealed that Abacus was managing funds connected to Ed Hindelang's drug trafficking activities.

18. Review of documents from Abacus revealed that in 1981, the firm received funds from UBS and elsewhere for the alleged benefit of Batalla. Subsequently, two trusts were created: the Queen Noelle Settlement and the Harmony Trust. It was through these two trusts that Ed Hindelang's drug proceeds first entered Abacus, and it was from the funds settled into these two trusts that all subsequent trusts, settlements and/or accounts were created.

19. The Abacus documents indicated that no other significant capital contributions were made into the Queen Noelle Settlement or the Harmony Trust, or any trusts, settlements or accounts subsequently created, other than the initial deposits of Ed Hindelang's drug proceeds.

20. Abacus documents reveal that after the establishment of the Queen Noelle Settlement and the Harmony Trust, a number of complex networks of interrelated trusts and corporate entities were created to facilitate and carry out the purpose of the trusts. Funds from the Queen Noelle Settlement and the Harmony Trust were used to fund successor trusts, settlements, accounts and other corporate entities.

Civil Forfeiture Actions

21. Four civil complaints for forfeiture were filed in the Southern District of Florida seeking the forfeiture of certain assets located in Jersey, Guernsey and Colorado in: 1) United States v. All Funds Within Sixteen (16) Accounts Held in the Financial Institutions Located in the States

of Jersey (Channel Islands) as listed in "Attachment A," Case No. 00-0656-Civ-Middlebrooks; 2) United States v. Real Property Located at 2211 East Sopris Creek Road, Basalt, Pitkin County, Colorado, Case No. 00-2850-Civ-Middlebrooks; 3) United States v. All Assets Listed on Schedule A Hereto, etc., Case No. 01-1181-Civ-Middlebrooks; and 4) United States v. All Funds and All Contents Held In Account No. 2029-561-38169, in the Name of Empire World Holdings, At the Royal Bank of Scotland International, St. Peter Port, Guernsey, and Any Accrued Interest or Appreciation Thereon; and All Funds and All Contents Held in Account No. 90825867, in the Name of Trans-global 1996, at Barclays Bank Plc, St. Peter Port, Guernsey, and Any Accrued Interest or Appreciation Thereon, Case No. 01-3454-Civ-Middlebrooks. The complaints alleged that those assets originated from the Queen Noelle Settlement or the Harmony Trust which had been funded with Ed Hindelang's drug proceeds.

22. Judge Middlebrooks granted summary judgment in the first two cases in favor of the United States and against the Claimants for 1) lack of standing, and 2) after finding that the government met its burden of probable cause, found that both Claimants failed to establish their respective innocent ownership defenses. In the second two cases, he granted a partial summary judgment in favor of the United States against Claimant Batalla for lack of standing, granted a stay for Claimant Batalla regarding three (3) assets and granted a stay for Claimant Starr. The stays are still pending.

FACTS REGARDING NEWLY DISCOVERED ASSETS

The Principality of Monaco ("Monaco") Investigation

23. The investigation has revealed that in 1991, The Batalla Settlement (Monaco) and the now-terminated TBE Settlement (Monaco) were established and funded with approximately \$13

million derived from the Queen Noelle Settlement and Harmony Trust, which were traceable to Ed Hindelang's drug proceeds.

24. The investigation revealed that the trusts and/or settlements were managed or administered by Landmark Management S.A.M. ("Landmark"), or its predecessor(s), a financial services firm located in Monaco. The trusts include The Batalla Settlement, the now-terminated TBE Settlement, The Children's Assistance Trust, and the now-terminated Duke Settlement. The trustee for these trusts and/or settlements is the General Trust Company S.A. administered by Landmark.

25. The investigation revealed that presently existing companies associated with the Batalla Settlement (Monaco) include, inter alia, Yateley Investments Limited, a BVI corporation; Shaboom Investments Inc., a Panama corporation; Shaboom Oil Inc., a U.S. corporation; and Broadhurst Development Corp., a Panama corporation.

26. The investigation revealed that the Batalla Settlement (Monaco) funded a bank account in the name of Quadrangle Nominees Ltd. K207, account number 20357480001, at Barclay's Bank, PLC, Monaco.

27. The Batalla Settlement also funded an account located at HSBC Republic Bank; an account at Merrill Lynch; and acquired 27 shares of Quantum Endowment Fund NV; 2,482.691 shares of Asian Infrastructure Development Holdings Ltd.; 3,530.004 shares of Quantum Industrial Holdings Ltd.; 12,082 shares of Dolphin Fund PLC; and a Metropolitan Life Insurance policy. In addition, loans were often made between and among the trusts and/or settlements and the related corporate entities.

28. Based on the totality of the circumstances as described above, the defendant properties were purchased with drug proceeds traceable to the drug trafficking activities of Ed Hindelang.

FORFEITURE ALLEGATION - DRUG PROCEEDS

29. The allegations contained in paragraphs 1 through 28 are re-alleged and incorporated by reference as though fully set forth herein.

30. The defendant properties,

a) ANY AND ALL ASSETS OF THE BATALLA SETTLEMENT, HELD BY THE GENERAL TRUST COMPANY S.A., AS TRUSTEE, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO, AND

b) ANY AND ALL ASSETS OF THE CHILDREN'S ASSISTANCE TRUST, HELD BY THE GENERAL TRUST COMPANY S.A., AS TRUSTEE, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO; AND

c) ANY AND ALL FUNDS IN ACCOUNT NO. 20357480001 IN THE NAME OF "QUADRANGLE NOMINEES LTD K207" AT BARCLAY'S BANK PLC, PRINCIPALITY OF MONACO, FURTHER DESCRIBED ON SCHEDULE A, ATTACHED HERETO, were derived from funds which originated from or are traceable to the Queen Noelle Settlement or the Harmony Trust. The defendant properties, therefore, represents proceeds of the drug trafficking activities of Ed Hindelang.

31. Based upon the totality of the circumstances as described above, the said defendant properties constitute proceeds traceable to one or more exchanges for a controlled substance, in violation of 21 U.S.C. §§ 801, et seq.

32. By reason of the foregoing, the said defendant properties are subject to seizure pursuant to the provisions of 21 U.S.C. § 881(b), and forfeiture to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(6).


WHEREFORE, Plaintiff, the United States of America, requests the Court to issue a Warrant of Arrest In Rem for the defendant properties, including any interest or appreciation thereon, and to bring the defendant properties within its jurisdiction pursuant to such Warrant of Arrest In Rem. Plaintiff further requests the Court to direct any and all persons having any claim to or interest in the defendant properties to file and serve their verified claims and answers as required by the Supplemental Rules for Certain Admiralty and Maritime Claims and 18 U.S.C. § 983(a)(4), or suffer default thereof; to declare the defendant properties condemned and forfeit to the United States of America, pursuant to 21 U.S.C. § 881(a)(6), for disposition according to law; and to grant the United

States such other and further relief as the Court deems just and proper, together with costs and disbursements of this action.

Respectfully submitted,

MARCOS DANIEL JIMENEZ
UNITED STATES ATTORNEY


By:


BARBARA PAPADEMETRIOU
ASSISTANT U.S. ATTORNEY
FLORIDA BAR NO. 0880086
99 NE 4TH STREET
MIAMI, FLORIDA 33132
TEL: (305) 961-9036
FAX: (305) 536-7599

VERIFICATION

I, Deborah Keuthan Crane, Special Agent with the United States Immigration and Customs Enforcement, hereby declare under penalty of perjury, as provided by 28 U.S.C. § 1746, that the foregoing Complaint for Forfeiture in Rem is based on information known to me, and that the facts alleged therein are true and correct to the best of my knowledge and belief.

EXECUTED, on this 28 day of OCTOBER 2003.


DEBORAH KEUTHAN CRANE
SPECIAL AGENT
UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT

"SCHEDULE A" TO COMPLAINT

**THE GENERAL TRUST COMPANY S.A., AS TRUSTEE,
PRINCIPALITY OF MONACO**

1. The Batalla Settlement, any and all assets including but not limited to any and all earned and/or accrued interest thereon and any payments related thereto
1. Yateley Investments Limited
All ownership shares of Yateley Investments Limited and any and all assets of Yateley Investments Limited, including but not limited to:
 1. Account no. 678923 located at HSBC Republic Bank

Any and all funds on held on behalf of Yateley Investments Limited in account no. 678923 in the name of "Onjet International Co. Inc. USD current account" at the HSBC Republic Bank, Monaco, any and all accrued interest thereon, and any payments related thereto
 2. Merrill Lynch USD Current account

Any and all funds on held on behalf of Yateley Investments Limited in account no. 122-07087 in the Merrill Lynch USD Current account at Merrill Lynch, Monaco, any and all accrued interest thereon, and any payments related thereto
 3. Merrill Lynch USD Call account

Any and all funds on held on behalf of Yateley Investments Limited in account no. 122-07087 in the Merrill Lynch USD Call account at Merrill Lynch, Monaco, any and all accrued interest thereon, and any payments related thereto
 4. Merrill Lynch USD Deposit account

Any and all funds on held on behalf of Yateley Investments Limited in account no. 122-07087 in the Merrill Lynch USD Deposit account at Merrill Lynch, Monaco, any and all accrued interest thereon, and any payments related thereto

5. 27 shares of Quantum Endowment Fund NV

27 shares of Quantum Endowment Fund NV and any payments related thereto on behalf of Yateley Investments Limited in account no. 007927 in the name of "Onjet International Co. Inc. A/C Yateley"

6. 2,482.691 shares of Asian Infrastructure Development Holdings Ltd.

2,482.691 shares of Asian Infrastructure Development Holdings Ltd. and any payments related thereto on behalf of Yateley Investments Limited in account no. 004279 in the name of "Onjet International Co. Inc. A/C No. 25025"

7. 3,530.004 shares of Quantum Industrial Holdings Ltd.

3,530.004 shares of Quantum Industrial Holdings Ltd. and any payments related thereto, on behalf of Yateley Investments Limited in account no. 005841 in the name of "Onjet International Co. Inc. A/C No. 25025"

8. 12,082 shares of Dolphin Fund PLC

12,082 shares of Dolphin Fund PLC and any payments related thereto, on behalf of Yateley Investments Limited in the name of "Onjet International Co. Inc. A/C Yateley"

9. Metropolitan Life Insurance policy no. 930350375A

Metropolitan Life Insurance policy no. 930350375A owned by Yateley Investments Limited

2. Shaboom Investments Inc.

All ownership shares of Shaboom Investments Inc., any and all assets including but not limited to any and all earned and/or accrued interest thereon, and any payments related thereto

1. Shaboom Oil Inc.

All ownership shares of Shaboom Oil Inc., any and all assets including but not limited to any and all earned and/or accrued interest thereon, and any payments related thereto

2. Broadhurst Development Corp.

All ownership shares of Broadhurst Development Corp., any and all assets including but not limited to any and all earned and/or accrued interest thereon, and any payments related thereto

2. The Children's Assistance Trust, any and all assets including but not limited to any and all earned and/or accrued interest thereon and any payments related thereto

BARCLAY'S BANK PLC, PRINCIPALITY OF MONACO

"Quadrangle Nominees Ltd K207" account

Any and all funds in account no. 20357480001 in the name of "Quadrangle Nominees Ltd K207" at Barclay's Bank PLC, Monaco, any and all accrued interest thereon, and any payments related thereto

CIVIL COVER SHEET

03 22884

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

GIV-LENNARD

COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

(b)

MAGISTRATE JUDGE
(EXCEPT IN U.S. PLAINTIFF CASES) SIMONTON

DEFENDANTS

ANY AND ALL ASSETS OF THE BATALLA SETTLEMENT, etc.
ANY AND ALL ASSETS OF THE CHILDREN'S ASSISTANCE
TRUST, ETC., AND ANY AND ALL FUNDS IN ACCOUNT NO.
20357480001 IN THE NAME OF "QUADRANGLE
NOMINEES LTD K207, et al.

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

AUSA Barbara Papademetriou
99 NE 4th Street
Miami, Florida 33132
(305) 961-9036

ATTORNEYS (IF KNOWN)

(d) CIRCLE COUNTY WHERE ACTION AROSE: DADE, MONROE, BROWARD, PALM BEACH, MARTIN, ST. LUCIE, INDIAN RIVER, OKEECHOBEE, HIGHLANDS

II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

A CONTRACT	A TORTS	FORFEITURE/PENALTY	A BANKRUPTCY	A OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits Stockholders' Suits <input type="checkbox"/> 160 Other Contract <input type="checkbox"/> 190 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other A LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 A PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark B SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
A REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	A CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL UNLESS DIVERSITY.)

21 U.S.C. § 881(AA)(6) - Forfeiture drug proceeds

LENGTH OF TRIAL

via 15 days estimated (for both sides to try entire case)

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ YES ☐ NO

VIII. RELATED CASE(S) (See instructions): IF ANY

JUDGE

MIDDLEBROOKS

DOCKET NUMBER

01-3454-Civ-DMM

01-1181-Civ-DMM

00-2850-Civ-DMM

00-0656-Civ-DMM

DATE

October 28, 2003

SIGNATURE OF ATTORNEY OF RECORD

AUSA Barbara Papademetriou

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE